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Attorneys for Federal Defendants

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION

CALIFORNIA COALITION FOR WOMEN	)	Case No. 4:23-cv-04155-YGR
PRISONERS, et al.,	)	
	)	
Plaintiffs,	)	<b>STIPULATION RE BRIEFING SCHEDULE</b>
	)	<b>FOR PLAINTIFFS' MOTION FOR A</b>
v.	)	<b>PRELIMINARY INJUNCTION (ECF NO. 10);</b>
	)	<b><del>[PROPOSED]</del> ORDER</b>
UNITED STATES OF AMERICA FEDERAL	)	
BUREAU OF PRISONS, et al.,	)	
	)	
Defendants.	)	

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs and the Federal Defendants, United States of America Federal Bureau of Prisons, Bureau of Prisons Director Colette Peters, in her official capacity, and FCI Dublin Warden Thahesha Jusino, in her official capacity, by and through undersigned counsel, submit this stipulated joint request regarding the briefing schedule for Plaintiffs' Motion for a Preliminary Injunction filed on August 17, 2023 (ECF No. 10) ("P.I. Motion").

1. Plaintiffs filed this action on August 16, 2023, against the Federal Defendants and individual officers named in their individual capacity. ECF No. 1.

2. On August 17, 2023, Plaintiffs filed a motion for a preliminary injunction, ECF No. 10, and a motion to certify class, ECF No. 11.

3. On August 18, 2023, the Court issued an order finding this case is related to 4:22-cv-

1 5137-YGR. ECF No. 12.

2 4. On September 9, 2023, the parties represented to the Court that representation issues  
3 regarding the Federal Defendants had not yet been resolved, and the parties stipulated to additional time  
4 for Defendants to respond to Plaintiffs' motions. ECF No. 21. The Court granted that stipulation on  
5 October 4, 2023. ECF No. 25.

6 5. On October 17, 2023, pursuant to 28 U.S.C. § 515, this matter was assigned to the U.S.  
7 Attorney's Office for the District of Montana. The Assistant U.S. Attorneys who will be assigned to this  
8 matter are awaiting appointment as Special Attorneys to appear on behalf of the government in the  
9 Northern District of California.

10 6. The parties acknowledge the Order entered by this Court on July 7, 2023, in *M.R. v. FCI*  
11 *Dublin*, 22-cv-05137-YGR, and related cases, staying "[a]ll current cases and any future related civil  
12 actions" until Monday, December 18, 2023. The parties agree that Plaintiffs' P.I. Motion should be  
13 excepted from this stay and agree to the following briefing schedule for the motion:

- 14 a) Federal Defendants' Response to Motion for Preliminary Injunction to be filed by  
15 November 13, 2023  
16 b) Plaintiffs' Reply to be filed by November 24, 2023

17 7. The parties will address the briefing schedule for Plaintiffs' motion for class certification,  
18 Defendants' deadline to answer or otherwise respond to the Complaint, and other issues as part of the  
19 meet and confer process in advance of the Initial Case Management Conference set in this and related  
20 cases for December 11, 2023, ECF No. 33.

21 IT IS SO STIPULATED.

22 DATED: October 18, 2023

Respectfully submitted,

23 RIGHTS BEHIND BARS  
24 CALIFORNIA COLLABORATIVE FOR  
25 IMMIGRANT JUSTICE  
26 ROSEN BIEN GALVAN & GRUNFELD LLP

27 /s/ Kara Janssen  
28 KARA JANSSEN

Attorneys for Plaintiffs

1 DATED: October 18, 2023

Respectfully submitted,

2 ISMAIL J. RAMSEY  
United States Attorney

3 /s/ Pamela T. Johann  
4 PAMELA T. JOHANN  
Assistant United States Attorney

5 Attorneys for Federal Defendants  
6

7 **ECF ATTESTATION**

8 In accordance with Civil Local Rule 5-1(i)(3), I, Pamela T. Johann, attest that I have obtained  
9 concurrence in the filing of this document from all other signatories listed here.

10 /s/ Pamela T. Johann  
11 PAMELA T. JOHANN  
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~~[PROPOSED]~~ ORDER

Pursuant to the stipulation, briefing on Plaintiffs' motion for a preliminary injunction shall be as follows: Federal Defendants' opposition to Plaintiffs' motions shall be filed on or before November 13, 2023, and Plaintiffs' reply shall be filed on or before November 24, 2023. The hearing on Plaintiffs' motion is set for December 11, 2023, over zoom.

**IT IS SO ORDERED.**

DATED: October 26, 2023

  
HON. YVONNE GONZALEZ ROGERS  
United States District Judge